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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) No. CR 10-0100 MHP
13 Plaintiff,) STIPULATION AND [PROPOSED]
14 v.) INTERIM PROTECTIVE ORDER RE:
15 GINA TCHIKOVANI,) DISCOVERY OF FINANCIAL ACCOUNT
16 Defendant.) AND IDENTITY INFORMATION
17 _____)

18 The Defendant, Gina Tchikovani, is charged with one count of conspiracy to commit wire
19 fraud, in violation of 18 U.S.C. § 1349.

20 The United States will produce and has produced to counsel for the defendant discovery
21 consisting of business records, financial institution records, law enforcement reports, and other
22 records and documents. Included within this discovery is bank account information (including
23 account numbers) and personal identity information (including, for example, names, dates of
24 birth, social security numbers, and driver's license numbers). Because of the substantial amount
25 of financial account and personal identity information to be produced in this case, and pursuant
26 to Federal Rule of Criminal Procedure 16(d), the parties stipulate, and the hereby Court orders,
27 that disclosure of these materials shall be subject to the following restrictions:

28
STIPULATION AND [PROPOSED] INTERIM
PROTECTIVE ORDER
CR 10- 100 MHP

1 1. Except when being actively examined for the purpose of the preparation of the
2 defense, all discovery containing financial account and personal identity information produced by
3 the United States to counsel for the defendant shall be maintained in an area that is accessible
4 only to defense counsel or other attorneys and employees of counsel's law office. Defense
5 counsel shall not permit any person access of any kind to the discovery except as set forth below.

6 2. The following individuals may examine the discovery for the purpose of preparing
7 the defense:

- 8 (a) Counsel for the defendant, and any other attorneys, paralegals, or
9 investigators in counsel's law office;
10 (b) The defendant, but only in the presence of defendant's counsel; and
11 (c) Any outside expert retained by the defense to analyze the discovery in this
12 matter.

13 3. A copy of this Order shall be maintained with the discovery at all times.

14 4. No other person may be allowed to examine the discovery without further court
15 order.

16 5. All pleadings will comply with Federal Rule of Criminal Procedure 49.1
17 regarding redaction of certain identifying information.

18 6. Within 30 days of the judgment and sentencing hearing in this matter, or within
19 30 days of any other resolution of the case, all material provided to defense counsel pursuant to
20 this Order, and all other authorized copies, if any, shall be returned to the United States. If an
21 appeal is noticed and defense counsel continue to represent the defendant on appeal, defense
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1 counsel may continue to retain possession of the materials according to the terms of this Order
2 until the conclusion of the matter in the Court of Appeals.

3 IT IS SO STIPULATED:

4 DATED: July 2, 2010

JOSEPH P. RUSSONIELLO
United States Attorney

9 DATED: July 2, 2010

6 /s/
7 TRACIE L. BROWN
8 Assistant United States Attorney

10 IT IS SO ORDERED.

11 DATED: July 6, 2010

12 /s/
13 CHARLES BOURDON/RUTH EDELSTEIN
14 Attorneys for Gina Tchikovani

